

CALFRESH (CF) PROGRAM

REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO:		5. DATE OF REQUEST:	NEED RESPONSE BY:
<input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:		04/14/16	04/25/16
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION:	
3. PHONE NO.:		LOS ANGELES COUNTY	
4. REGULATION CITE(S):		7. SUBJECT:	
MPP 63-406.1, 63-406.21, 63-301, 63-301.5		Student Eligibility	
		8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s).	
		MPP 63-406.1, 63-406.21, 63-301, 63-301.5	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

We have an individual who has applied for CalFresh benefits and has been found to meet the definitions of a full-time student per MPP 63-406.1. At the same time, he has also applied for our General Relief Program that requires him to comply with an education or training requirement which will in turn fulfill the exemptions for students under MPP 63-406.21. He attends the initial work requirement orientation in an effort to show that he is willing to comply. The initial orientation itself is not sufficient for him to meet any of the exemptions for full time students. However, this second program allows him 30 days to complete this work requirement. Based on MPP 63-301, the counties should process the application as soon as possible but no later than 30 days from the date of application. Our question is should we consider this individual a potentially eligible student and allow him the 30 days processing time in an effort to enable him to complete their education/training requirement with the General Relief Program? Or should we deny the CalFresh application as soon we

Continued on next page

10. REQUESTOR'S PROPOSED ANSWER:

Proposed Answer 1: Yes, we should allow the individual the 30 days to complete the education/training requirements and deny the application on the 30th day if the individual hasn't completed it by then. We would deny the expedited services because the individual has not yet proven to be eligible to the CalFresh Program.

Proposed Answer 2: No, we would deny both the expedited service as well as the entire application because the student doesn't meet the eligible student criteria on the day of the interview. This second response would open up for the client coming back to re-apply within 30 days of the denial because he has now completed the education/training requirement and is not considered an eligible student.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

Answer 1: Under the student eligibility regulations at MPP 63-406.216, an individual can retain CalFresh eligibility while attending an institution of higher education if he/she assigned to or placed in an institution of higher education through or in compliance with the requirements of Sections 63-406.216(a) through (e). However, the education components under the GROW program are not E&T college components and thus would not exempt an individual from student eligibility requirements. In regards to Expedited Service, the information provided on the application by the applicant should suffice in determining ES entitlement.

Answer 2: Based on the information provided, CDSS concurs with the county's response.

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ:
4/14/16	4/12/17 RA

CALFRESH (CF) PROGRAM
REQUEST FOR POLICY/REGULATION INTERPRETATION (Continued)

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:		5. DATE OF REQUEST: 04/14/16	NEED RESPONSE BY: 04/25/16
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION: LOS ANGELES	
3. PHONE NO.:		7. SUBJECT: Student Eligibility	
4. REGULATION CITE(S): MPP 63-406.1, 63-406.21, 63-301, 63-301.5		8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> NOTE: All requests must have a regulation cite(s) and/or a reference(s). MPP 63-406.1, 63-406.21, 63-301, 63-301.5	

have knowledge of his student status? Also, how do we treat expedited Services for this particular scenario.